

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

---

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**RHODE ISLAND COMMERCE  
CORPORATION (F/K/A RHODE ISLAND  
ECONOMIC DEVELOPMENT  
CORPORATION), WELLS FARGO  
SECURITIES, LLC, PETER M. CANNAVA,  
KEITH W. STOKES, and JAMES MICHAEL  
SAUL,**

**Defendants.**

---

**Civil Action No. 1:16-cv-107-M**

**ASSENTED-TO MOTION FOR EXTENSION OF TIME FOR DEFENDANT RHODE  
ISLAND COMMERCE CORPORATION TO RESPOND TO COMPLAINT**

Defendant Rhode Island Commerce Corporation (“RICC”) respectfully asks this Court to enter an order extending the time for the RICC to answer or otherwise respond to the Complaint as set forth herein. The Securities and Exchange Commission (“Commission”) assents to this request. In support of this motion, the RICC states:

1. On October 28, 2016, the Court entered an order granting the RICC’s Assented-to Motion for Extension of Time, pursuant to which order the RICC’s answer is presently due December 30, 2016.

2. The Commission and the RICC have reached a settlement in principle that would resolve the litigation between them. The settlement is awaiting formal approval by the Commission in accordance with normal procedures.

3. It is anticipated that the Commission’s decision concerning its approval of the settlement will be forthcoming in early January 2017.

4. The RICC requests that the deadline for the RICC to answer or otherwise respond to the Complaint be extended to January 30, 2017 in order to allow time for the Commission to complete its decision-making process concerning the settlement.

5. The RICC and the Commission have agreed that both parties' interests would be served by the additional time.

Dated: December 23, 2016

Respectfully submitted,

Defendant Rhode Island Commerce  
Corporation, through its attorneys,

/s/ Max Wistow

Max Wistow (#0330)  
Stephen P. Sheehan (#4030)  
Benjamin Ledsham (#7956)  
WISTOW, SHEEHAN & LOVELEY, PC  
61 Weybosset St  
Providence, RI 02903  
(401) 831-2700  
Fax: (401) 272-9752  
mwistow@wistbar.com  
spsheehan@wistbar.com  
bledsham@wistbar.com

/s/ S. Gale Dick

S. Gale Dick (admitted *pro hac vice*)  
Jeffrey I. Lang (admitted *pro hac vice*)  
COHEN & GRESSER LLP  
800 Third Avenue, 21<sup>st</sup> Floor  
New York, NY 10022  
Phone: (212) 957-7600  
Fax: (212) 957-4514  
sgdick@cohengresser.com  
jlang@cohengresser.com

Certificate of Service

I hereby certify that this document was filed through the ECF system on December 23, 2016, and will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Jeffrey I. Lang

Jeffrey I. Lang